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*Attorneys for Defendant Rob Bonta, in his official  
capacity as Attorney General of the State of  
California*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**ASSOCIATION FOR ACCESSIBLE  
MEDICINES,**

Plaintiff,

v.

**ROB BONTA, IN HIS OFFICIAL  
CAPACITY AS ATTORNEY GENERAL  
OF THE STATE OF CALIFORNIA,**

Defendant.

2:20-cv-01708-TLN-DB

**STIPULATION AND ORDER  
MODIFYING DISCOVERY  
DEADLINES**

Plaintiff Association for Accessible Medicines (“Plaintiff”) and Defendant Rob Bonta, in his official capacity as Attorney General of the State of California (“Defendant”), hereby stipulate and agree as follows:

WHEREAS, Defendant has served discovery on Plaintiff and five member companies of Plaintiff (the member companies the “Third Parties”);

WHEREAS, Defendant, Plaintiff, and the Third Parties have met, conferred, and reached an agreement regarding the scope of discovery that resolved all current outstanding disputes between them, without the need for motion practice or intervention by the Court (Dkt. No. 58);

1 WHEREAS, discovery is currently set to close on Wednesday May 31, motions for  
2 Summary Judgment are due on July 31, oppositions to motions for summary judgment are due on  
3 September 22, and replies are due on October 20 (Dkt. No. 63);

4 WHEREAS, one of the Third Parties was the subject of an unforeseen cyber security  
5 incident that prevented it from completing its production of electronic discovery, and the Third  
6 Party therefore requires additional time to meet the discovery deadline in this case;

7 WHEREAS, the Parties wish to extend the discovery deadline and ensuing deadlines for  
8 briefing on motions for summary judgment in order to accommodate the Third Parties;

9 WHEREAS, this is the second request by the Parties to extend or otherwise modify the  
10 discovery deadlines and is the result of an unforeseen cyber security incident;

11 WHEREAS, no trial has been scheduled in this action, and no hearing or other date set by  
12 the Court will be effected by the proposed schedule change.

13 NOW THEREFORE, IT IS STIPULATED AND AGREED THAT:

14 (1) The close of fact discovery should be extended from May 31 until July 14, 2023;

15 (2) The deadline for filing any motion for summary judgment, including any motion to  
16 convert the existing preliminary injunction into a final judgment; should be extended from July 31  
17 to September 15, 2023;

18 (3) The deadline for any opposition to a motion for summary judgment should be extended  
19 from September 22 to November 6, 2023;

20 (4) The deadline for any reply to a motion for summary judgment should be extended from  
21 October 20 to December 4, 2023.

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23 IT IS SO STIPULATED.  
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1 Dated: June 1, 2023

Respectfully Submitted,

2 ROB BONTA  
3 Attorney General of California  
4 EMILIO VARANINI  
5 KARLI EISENBERG  
6 Supervising Deputy Attorneys General

7 /s/ David Houska  
8 DAVID HOUSKA  
9 Deputy Attorney General  
10 *Attorneys for Defendant Rob Bonta, in his*  
11 *official capacity as Attorney General of the*  
12 *State of California*

13 /s/ Michael Shipley  
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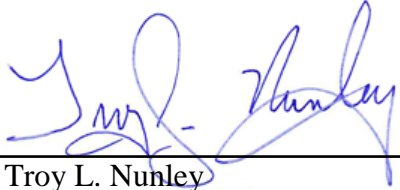
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*Counsel for Plaintiff Association  
for Accessible Medicines*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: June 1, 2023

  
Troy L. Nunley  
United States District Judge